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11 12	Counsel for Defendant Google LLC			
13	UNITED STATES DISTRICT COURT			
14				
15	NORTHERN DISTRICT OF CALIFORNIA			
16	(OAKLAND DIVISION)			
17	KIMBERLY NEGRON, on behalf of herself and	Case No.	4:21-cv-00801-HSG	
18	all others similarly situated,	DECLAR	RATION OF JUSTINA K.	
19	Plaintiff,		IS IN SUPPORT OF	
19	·		ANT GOOGLE LLC'S	
20	v.		STRATIVE MOTION TO UE CASE MANAGEMENT	
21	GOOGLE LLC,	CONFER		
22	Defendant.	Judge:	Hon. Haywood S. Gilliam, Jr.	
23	Defendant.	Date:	May 6, 2021	
23		Time:	2:00 p.m.	
24		Courtroon	n: 2, 4th Floor	
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	DECLARATION OF JUSTINA K. SESSIONS IN SUPPORT OF		CASE No. 4:21-CV-00801-HS0	

DEFENDANT GOOGLE LLC'S ADMINISTRATIVE MOTION TO CONTINUE CASE MANAGEMENT CONFERENCE

I, JUSTINA K. SESSIONS, declare as follows:

1. I am a partner with the firm Wilson Sonsini Goodrich & Rosati, P.C., counsel of			
record for Defendant Google LLC ("Google"). I am an attorney duly admitted to practice in the			
State of California and before this Court. I make this declaration in support of Google's			
Administrative Motion to Continue Case Management Conference. I have personal knowledge of			
the facts set forth below and, if called and sworn as a witness, I could and would testify			
competently thereto.			

- 2. On February 5, 2021, the Court set the initial Case Management Conference ("CMC") in this matter for May 11, 2021, with the Case Management Statement due by May 4, 2021. *See* Clerk's Notice Setting Case Management Conference for Reassigned Civil Case, ECF No. 13.
- 3. On March 23, 2021, following the submission of the parties' stipulation, the Court entered an Order Regarding Complaint Response Deadlines (as modified), ECF No. 23, setting (1) Google's deadline to respond to Plaintiff's Complaint as June 4, 2021; (2) Plaintiff's deadline to respond to any motion to dismiss as August 3, 2021; and (3) Google's deadline for any reply brief as September 3, 2021.
- 4. On April 15, 2021, I met and conferred with Plaintiff's counsel (Mr. Isquith, Sr., Mr. Isquith, Jr., Ms. Markert, and Ms. Baxter-Kauf). Mr. Isquith, Sr. indicated that Plaintiff's counsel had been contacted by several people and were considering filing additional complaints that they would then seek to relate to this case. Mr. Isquith, Jr. stated that Plaintiff's counsel intended to substitute a new plaintiff in the place of Ms. Negron.
- 5. On April 21, 2021, I emailed Plaintiff's counsel (Mr. Isquith, Jr., Ms. Markert, and Ms. Baxter-Kauf), stating that Google intended to file a motion to continue the CMC.
- 6. On April 22, 2021, I met and conferred with Mr. Isquith, Jr., Ms. Markert, and Ms. Baxter-Kauf. We discussed Google's intention to move to continue the CMC. Plaintiff's counsel stated that they did not agree to Google's request. We proceeded to discuss the matters required in an initial CMC statement, including, *inter alia*, discovery, and case scheduling.

1	7. Google's motion to continue the CMC will not prejudice Plaintiff. Google has			
2	taken steps to preserve potentially relevant information, and the parties have reviewed the			
3	Guidelines Relating to the Discovery of Electronically Stored Information and began the meet and			
4	confer process pursuant to Fed. R. Civ. P. 26(f) and the Standing Order for All Judges of the			
5	Northern District of California. Google will respond to the Complaint by the deadlines agreed			
6	upon by the parties and ordered by the Court.			
7	8. Attached hereto as Exhibit A is a true and correct copy of Complaint and Jury			
8	Demand, ECENT Corp. v. Google, LLC, et al., No. 5:21-cv-00251 (S.D. W. Va. Apr. 19, 2021),			
9	ECF No. 1.			
10	9. Attached hereto as Exhibit B is a true and correct copy of Class Action Complaint,			
11	Cliffy Care Landscaping LLC v. Facebook Inc., et al., No. 1:21-cv-00360-KBJ (D.D.C. Feb. 9,			
12	2021), ECF No. 1.			
13	10. Attached hereto as Exhibit C is a true and correct copy of Amended Complaint,			
14	Texas v. Google LLC, No. 4:20-cv-00957-SDJ (E.D. Tex. Mar. 15, 2021), ECF No. 77.			
15	I declare under penalty of perjury that the foregoing is true and correct, and that this			
16	declaration was executed in Santa Barbara, California on April 27, 2021.			
17	/s/ Justina K. Sessions			
18	Justina K. Sessions			
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